

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA                    )  
  )  
                  v.                                )  
  ) Cr. No. 04-10336-NMG  
REYNALDO RIVERA                            )  
  )  
Defendant                                     )

GOVERNMENT'S MOTION TO CONTINUE SENTENCING HEARING  
AND FOR STATUS CONFERENCE HEARING

Introduction

The United States, by its attorneys, Michael J. Sullivan, United States Attorney, and William F. Bloomer, Assistant U.S. Attorney, respectfully moves this Court in the above-captioned matter to (1) continue the sentencing hearing on January 24, 2007 to a date after February 13, 2007, and (2) schedule a status conference prior to December 13, 2006.

As grounds therefor, the government states the following:

1. The defendant, Reynaldo Rivera ("Rivera"), pleaded guilty to Counts One, Two, and Three through Six of the Superseding Indictment on October 19, 2006. A hearing was set for sentencing on January 24, 2007.
2. On December 4, 2006, the government received notification that counsel for Reynaldo Rivera had been suspended from the practice of law from December 13, 2006, to February 13, 2007. The government also received a copy of a document entitled "Notice of Withdrawal" from defense counsel.

The government respectfully urges that this Court set a status conference date prior to December 13, 2006 (the date upon which defense counsel's suspension is to take place) in order to address Mr. Rivera's legal representation and counsel's motion to withdraw from this case. The government further requests that this Court continue Mr. Rivera's sentencing date until after February 13, 2007, at which time counsel may continue to represent Mr. Rivera, if this Court denies the motion to withdraw, as a fully license member of the Bar.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ William F. Bloomer  
William F. Bloomer  
Assistant U.S. Attorney  
One Courthouse Way  
Boston, MA  
(617) 748-3644

Date: 6 December 2006

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and mailed to all those not participating in ECF.

/s/ William F. Bloomer  
William F. Bloomer